

1 in the case of Odessa there really was only a bare
2 construction permit and if you recall that the amount in
3 question was \$12,500.

4 A Yes, sir, so what is the question again, please?

5 Q Did you have any involvement in the closing?

6 A No, sir.

7 Q Do you know whose check was utilized to close on
8 behalf of National Minority TV?

9 A No, sir.

10 Q Please turn to Mass Media Exhibit 168.

11 A Yes, sir.

12 Q And I'm not going to ask you to study the letter
13 especially because it's not written to you and there's no
14 indication that you received a copy of this, but this is a
15 grouping that is made by Mr. May in connection with some
16 information that he is passing along to Mrs. Duff. Do you see
17 that?

18 A Yes, sir.

19 Q Just take a little bit of time so that you know what
20 it is I'm talking about.

21 A Um-hum. Yes, sir, I see that it's an index for the
22 renewal filing dates of several television facilities.

23 Q Now, if you turn to page 4, Roman Numeral 10, you'll
24 note that four stations that are grouped here pertain to
25 different licensees, do you see that?

1 A Yes, sir, I see that.

2 Q Now, do you have any explanation, from your personal
3 knowledge, as to how it came about that Mr. May grouped
4 National Minority TV station, Community Educational Television
5 stations and the Educational Television of Houston with
6 Trinity owned and operated stations in terms of transmitting
7 information to Mrs. Duff?

8 A Well, Mrs. Duff had a role to play in renewals since
9 all of these were stations in which Trinity had an interest so
10 obviously Mr. May just gave her information on the expected
11 filing dates for the renewal of all of these facilities
12 licenses.

13 Q Please turn to Mass Media Exhibit 171.

14 A Yes, sir.

15 Q We're introducing a new name here as far as you're
16 concerned. Who is Mr. George Sebastian?

17 A Mr. George Sebastian was actually a volunteer, he
18 was a semi-retired individual that volunteered his services as
19 an engineer assistant to Mr. -- primarily to Mrs. Duff and also
20 to Mr. Ben Miller.

21 Q Was he primarily involved in low-power activities?

22 A Yes.

23 Q And did he have any particular title that, you know,
24 to cover the functions that he performed?

25 A It may have been something like low-power

1 coordinator or something the that affect.

2 Q Now, working in the low-power area, who was he to
3 report to, I mean, did he have a direct supervisor or more
4 than one direct supervisor?

5 A His direct supervisor would be Mrs. Duff, from an
6 administrative standpoint.

7 Q And is there another standpoint?

8 A When it got over into engineering matters, Mr.
9 Miller was not his direct administrative head but there was
10 certainly lots of information and cooperation that went on
11 between the two of them.

12 Q Did you ever come to understand that Mr. Sebastian
13 was performing services, albeit on a volunteer basis, for both
14 Trinity Broadcasting Network and National Minority TV?

15 A I understood that he was providing those services to
16 both, yes, sir.

17 Q Would you please turn to Mass Media Exhibit 174.

18 A Yes, sir.

19 Q And I can tell you this is a portion, it is not the
20 entire application for the Portland acquisition. A more
21 complete copy would appear in documents that have been
22 prepared by your counsel if you feel the need to see a
23 complete application.

24 JUDGE CHACHKIN: Well, what exhibit is that?

25 MR. TOPEL: It would be a tab -- one of the tabs to

1 Mrs. Duff's testimony --

2 UNIDENTIFIED SPEAKER: If you'd like to --

3 MR. TOPEL: 101(T).

4 JUDGE CHACHKIN: That's 101(t), that's this --

5 MR. SHOOK: Yes.

6 JUDGE CHACHKIN: Does the witness want to have a
7 copy of the --

8 MR. TOPEL: Now, my only concern is that the
9 questioning refer to the same exhibit that the witness has
10 because the page numbers may be different.

11 JUDGE CHACHKIN: All right, why don't we let you
12 continue with your questioning of the witness, if he has a
13 need to look at the entire one, he can look at it.

14 MR. TOPEL: Your Honor, can we go off one second?

15 JUDGE CHACHKIN: Yes.

16 (Off the record.)

17 JUDGE CHACHKIN: Back on the record.

18 BY MR. SHOOK:

19 Q Now, Dr. Crouch, what you have before you and your
20 counsel will verify it for you in the event you've got any
21 question about this is the assignee's portion, that is, the
22 portion that would have been filled out by National Minority
23 TV. You do not have in front of you the portion that was
24 filled out by the seller, the assignor, nor do you have the
25 asset purchase agreement, that's not here.

1 A I understand.

2 Q Now, with in mind, would you please turn to page 8.

3 A Yes, sir, I'm there.

4 Q And that in your signature?

5 A Yes, sir.

6 Q Title, president?

7 A Yes, sir.

8 Q Please turn to page 3. You understand that the

9 information is incomplete?

10 A Yes, sir, this would be identical for the Odessa

11 assignment.

12 Q Would I correct that basically when you saw this,

13 this meaning the assignee's portion of the Portland

14 application that you gave it essentially the same type of

15 review that you gave the Odessa application?

16 A I think that would be a fair statement, sir?

17 Q And that the same mistakes that first of all appear

18 on page 3 and if we go to page 10, specifically the first

19 paragraph --

20 A Yes.

21 Q -- the same absence of noting your brother as an

22 officer and Mr. Hickey as an officer, do you see that?

23 A Yes, sir.

24 Q Had you discussed the preparation of this

25 application with anyone prior to the time it was presented to

1 you for signature?

2 A Not to my recollection, sir, no.

3 Q Now, there is something different here and for that
4 please turn to page 12.

5 A Yes, sir.

6 Q We have information relative to Markets 13 and 14
7 that appear here, do you see that?

8 A Yes, sir.

9 Q Did you -- do you remember focusing on this
10 information at all and noting, for example, that while the
11 Odessa station certainly appears to have the smallest market,
12 that it isn't noticeably smaller than the market for
13 Poughkeepsie?

14 A That is very curious which leads me to believe that
15 those Poughkeepsie numbers are grossly in error, sir.

16 Q But this isn't something that caught your eye at the
17 time you reviewed and signed this application.

18 A No, sir, I simply understood that counsel was taking
19 care of this aspect of it, even if I had focused narrowly on
20 it at the time, I don't know that it would have been of any
21 cause of alarm for me.

22 Q I'd like you to turn to Mass Media Exhibit 175.

23 JUDGE CHACHKIN: Well, before we get to that, again,
24 Mr. -- assure me that -- assured me that there was information
25 in the Portland assignment application respect to Ms. Duff's

1 | past and present relationship with TBN --

2 | MR. TOPEL: No, Your Honor.

3 | JUDGE CHACHKIN: -- but I've looked through it and I
4 | can't find any.

5 | MR. TOPEL: No, contemporaneously filed with the
6 | pendency of this application is the annual employment report
7 | for KTBN which lists Mrs. Duff as administrative assistant to
8 | the president of KTBN.

9 | JUDGE CHACHKIN: Did it ever list the fact that she
10 | was formerly a director of TBN, is that revealed to the
11 | Commission?

12 | MR. TOPEL: In the annual employment report, I don't
13 | know.

14 | JUDGE CHACHKIN: Or in any report.

15 | MR. TOPEL: I'll have to check the ownership reports
16 | that were filed --

17 | JUDGE CHACHKIN: But certainly --

18 | MR. TOPEL: I don't want to assert to you something
19 | that I can't recall specifically.

20 | JUDGE CHACHKIN: Again, Dr. Crouch, you certified
21 | that this was full and complete and there's supposed to be
22 | here Exhibit 1 contains broadcast interests and statement of
23 | compliance with Rule 73.355D.

24 | DR. CROUCH: Yes, sir.

25 | MR. TOPEL: Your Honor -- Mrs. Duff is not a

1 | director of TBN at this time.

2 | JUDGE CHACHKIN: I didn't say at this time, but
3 | previously.

4 | MR. TOPEL: Oh, oh, well, there -- when she was a
5 | director, I'm sure there are ownership reports to the
6 | Commission --

7 | JUDGE CHACHKIN: That may be so but now we're
8 | focusing on a particular application which the Commission had
9 | before it.

10 | MR. TOPEL: Right.

11 | JUDGE CHACHKIN: And I note there's a state --
12 | Exhibit 1 is supposed to deal with compliance with this rule
13 | but I can't find anything in the exhibit which related to Ms.
14 | Duff's role either as assistant to the president of TBN or
15 | many functions at TBN or the fact that she was previously a
16 | director of TBN as well as Trinity stations, numerous Trinity
17 | television stations. Can you explain, in view of the fact
18 | that you had told Mr. May to provide this information not only
19 | in Odessa and now we have the second application filed seeking
20 | the exemption for fourteen stations why there's no mention
21 | here of Ms. Duff's involvement with TBN?

22 | DR. CROUCH: May I ask a question, Your Honor?

23 | JUDGE CHACHKIN: Yes, if you wish.

24 | DR. CROUCH: Is there any rule of the agency that --

25 | JUDGE CHACHKIN: I didn't say there was any rule of

1 the agency, sir, what we're talking about -- of course, there
2 was a rule of the agency, if you look at the Commission's
3 designation -- and if you look at the rule, Commission makes
4 clear very well that we're talking about stations we're not --
5 which are not controlled -- well, the specific language here
6 -- yes, there is a rule, sir. When the Commission came out
7 with their exemption, they did provide and it's reflected in
8 the designation order. If you notice the Commission's
9 statement here, let me read from the designation order.
10 "Furthermore, Section 73.35 --

11 MR. TOPEL: Where are you reading from, Your Honor?

12 JUDGE CHACHKIN: Well, I'm reading from page 3 --

13 MR. TOPEL: I've got it, yes.

14 JUDGE CHACHKIN: -- where it talks about the de
15 facto control, the multiple ownership issues.

16 MR. TOPEL: Thank you.

17 JUDGE CHACHKIN: And the commission there states
18 "furthermore, Section 73.3555(e)(3)(iii) of the Commission's
19 rule states that the purpose of this rule 'minority control'
20 means more than 50 per cent owned by one or more members of a
21 minority group. As the Commission stated when it adopted its
22 multiple ownership rules, it permits group owners of
23 television or radio stations to utilize a maximum numerical
24 cap of fourteen stations provided that at least two of the
25 stations in which they hold cognizable interest or minority

1 control". And then the Commission -- that's what I'm talking
2 about. The Commission talked about minority control and --

3 DR. CROUCH: Well, sir, is the assumption here that
4 Mrs. Duff's participation as an employee of Trinity implies
5 control of National Minority?

6 JUDGE CHACHKIN: The point of the matter is, sir, I
7 don't want to get into what legally is or is not going to --
8 the Commission's designation -- discusses what control means
9 and I'm not going to get into the elements of control, the
10 designation order and the many Commission precedent dealing
11 with control and the Commission has made clear on numerous
12 times that there's no difference between commercial and non-
13 commercial or non-profit organizations in terms of what
14 constitutes control.

15 DR. CROUCH: Yes, sir.

16 JUDGE CHACHKIN: But you testified that you told
17 your lawyer, provide the fullest possible information as to
18 the principles and their past relationships if any to TBN so
19 that the Commission would have the full facts before it when
20 it determined whether or not you were entitled to exemption.
21 In fact, counsel, Mr. Shook, asked you specifically about --
22 and started asking you question about, did you have a
23 discussion concerning the fact that there have been common
24 meetings between TBN and NMTV and then he went into fact that
25 Ms. Duff had been a director and that she was assistant to the

1 president and you, I -- your testimony will speak for itself,
2 but your testimony was that you told your lawyer, provide the
3 fullest information possible concerning Ms. Shook's role and
4 your role and all the other principles's role in TBN so that
5 the Commission would have the fullest information in
6 determining whether or not you were -- NMTV was entitled to an
7 exemption.

8 DR. CROUCH: Sir.

9 JUDGE CHACHKIN: And all I'm saying is, I find
10 nothing in the exhibit which say anything about Ms. Duff's
11 role at TBN and I -- can you provide an explanation of that in
12 view of the fact that you assured us that you told your
13 counsel to provide all this information.

14 DR. CROUCH: Sir, I think what my testimony will
15 reveal is that what I instructed my counsel to do was to file
16 and put on the record everything he felt necessary to put on
17 the record. I don't believe my testimony said, and if it
18 does, I spoke in error, that I specifically focused on Mrs.
19 Duff's relationship to Trinity Broadcasting or other Trinity
20 affiliated organizations. I simply instructed counsel to
21 reveal to the agency everything he deemed necessary to see --
22 we were experimenting here, sir, we were the first to step
23 forward and do this, I understand. We simply wanted -- I
24 wanted him to put everything necessary on the record to see if
25 the agency agreed with us and felt that we qualified for the

1 exemption to the rule of twelve.

2 JUDGE CHACHKIN: So now your testimony is that you
3 left it for your counsel to put down that was necessary and
4 that you didn't tell him to put down all the full information
5 concerning the relationships of the principles, is that now
6 what your testimony is?

7 DR. CROUCH: Well, I didn't --

8 JUDGE CHACHKIN: You left it for your counsel to put
9 down what was necessary?

10 DR. CROUCH: I didn't know what all of the
11 information was necessary, sir.

12 JUDGE CHACHKIN: And your testimony is your counsel
13 didn't discuss with you what the word control means and
14 Commission precedent?

15 DR. CROUCH: I recall no such discussion as far as
16 that is concerned. I simply believed that he would put on the
17 record everything necessary for the agency to determine if we
18 met the requirements or not and if the answer was yes, we
19 would move forward, if the answer was no, we would not.
20 That's the best I can do, Your Honor, and I mean that in all
21 sincerity.

22 JUDGE CHACHKIN: Well, I understand that, but I got
23 the impression that you wanted your attorney to reveal the
24 full relationship of Ms. Duff to TBN so the Commission could
25 determine whether or not control existed and whether you're

1 | entitled to the exemption.

2 | DR. CROUCH: I didn't know what that -- the nature
3 | of that relationship -- or whether the nature of that
4 | relationship was necess-- I didn't know what was necessary to
5 | reveal to the agency.

6 | JUDGE CHACHKIN: So you didn't think the fact that
7 | Ms. Duff was a former owner of TBN since she was a director
8 | was something that the Commission would not be interested in
9 | to determine whether or not you were entitled to an exemption?

10 | DR. CROUCH: I didn't know if that was necessary or
11 | required, sir, I sincerely did not know that.

12 | JUDGE CHACHKIN: All right, go ahead.

13 | BY MR. SHOOK:

14 | Q Exhibit 175.

15 | A Yes, sir, I'm there.

16 | Q This is the newsletter for January 1988 and I would
17 | like you to turn to the second page.

18 | A Yes, sir.

19 | Q The "Paul" is you?

20 | A Yes, sir.

21 | Q Beginning -- it's about the middle of the page where
22 | it says "remember too, to pray for Italy", do you see that
23 | paragraph?

24 | A Yes, sir.

25 | Q Now, I'd like you to focus on the sentence "Como is

1 on the air and we are developing a local studio", etc., do you
2 see that?

3 A Yes, sir.

4 Q Now, is the "we" in the broadest sense TBN and its
5 partners?

6 A Oh, of course, because now we're talking about a
7 foreign station in Italy.

8 Q Now, there is a specific corporation formed in
9 Italy, correct, that TBN owned and ope-- owns and operates?

10 A Has an interest in, yes, sir.

11 Q Has an interest in. All right, the next sentence
12 reads "We are under construction in El Salvador for Channel
13 25".

14 A Yes.

15 Q Is the "we" there something different than the
16 previous "we"?

17 A No, sir, this again is "we" in the broadest network
18 and supporters of the network sense.

19 Q The next sentence "we are under construction in St.
20 Lucia which will cover the southern Caribbean Islands". The
21 "we" again is in the broadest sense that you previously
22 described?

23 A Yes, sir.

24 Q The next two sentences, "We are building Channel 42
25 in Midland/Odessa, Texas, we are waiting for FCC approval for

1 Channel 24 in Portland, Oregon." Now, who is that "we"?

2 A That again would be in the broadest sense, "we" as
3 we've just discussed and in the narrower sense, in this case,
4 of course, it would be National Minority TV for Midland/Odessa
5 and Portland.

6 Q Please turn to Mass Media Bureau Exhibit 176.

7 A Yes, sir.

8 Q Do you recall there being a separate annual meeting
9 for National Minority Television on January 11, 1988?

10 A This would appear to be that meeting that I referred
11 to earlier in my testimony. I knew that a time came when
12 National Minority began to really come of age as it were and
13 become a licensee of a television station, that counsel did
14 advise us that it was time to treat National Minority
15 differently, that it should begin now to stand on its own and
16 function more on its own and indeed have its own separate
17 annual meetings.

18 Q Did this annual meeting occur at the same time as
19 the annual meetings of the combined boards, and what we're
20 looking at is separate minutes or was there, in fact, a
21 separate meeting?

22 A It may have occurred on or about the same date but
23 it was, in my recollection, a completely separate meeting away
24 from and in a different location from the Trinity and
25 affiliate meeting.

1 Q By a different location, do you mean a different
2 office within the Trinity structure or outside the Trinity
3 building all together?

4 A I'm having a little trouble remembering because
5 there's been more than one now, I believe on some occasions it
6 was out of the building and in a restaurant. I believe on
7 some occasions it may have been simply in another location
8 within the Trinity building complex.

9 Q Now, this -- the minutes here don't reflect where
10 the meeting took place, do you have any knowledge as to where
11 this meeting occurred?

12 A No, sir, I do not.

13 Q Do you have any knowledge as to whether an agenda of
14 this meeting was prepared and sent to Reverend Espinoza prior
15 to the time the meeting occurred?

16 A I have no independent knowledge of that, sir.

17 Q Did you direct Mrs. Duff to so prepare an agenda and
18 send it the Reverend Espinoza prior to the meeting?

19 A I generally instructed Mrs. Duff to prepare the
20 agenda but whether or not she sent that to Mr. Espinoza, I'm
21 not certain.

22 Q So before this meeting starts you would know what
23 was going to happen and Mrs. Duff would know what was going to
24 happen but you don't know whether Reverend Espinoza had any
25 advance knowledge as to what was going to happen.

1 A That's correct.

2 Q Would you please turn to Mass Media Exhibit 177
3 which consists of two pages.

4 A Yes, sir, I'm there.

5 Q Now, focusing initially on the first page, there is
6 a note that begins, "Jane" and it's dated 1/14/88 and then
7 there are some initials that appear at the bottom of that
8 note.

9 A That, I believe, is the P.C. which was my brother
10 Philip Crouch's initials.

11 Q Please turn to Mass Media Exhibit 179.

12 A Yes, sir.

13 Q Now, I recognize that this document is not signed or
14 initialed by you but my question for you is that this document
15 reflects that it is for National Minority TV, do you see that
16 reference, where it says Items 4 and then there's a colon and
17 it says "National Minority Television, Inc."?

18 A Yes, sir.

19 Q And it concerns apparently Station KMLN which is the
20 Odessa station, correct?

21 A Yes.

22 Q Do you know with respect to Mr. Miller's activities
23 on behalf of National Minority TV, and this is just the first
24 of a number which we can go through, but do you know whether
25 Mr. Miller's salary from TBN was affected in any way by the

1 amount of time that he spent on matters for National Minority
2 Television?

3 A No, sir, it was not.

4 MR. SHOOK: Your Honor, we've completed this volume.

5 JUDGE CHACHKIN: Yes, sir.

6 BY MR. SHOOK:

7 Q Now, Dr. Crouch, I'd like you to turn to Mass Media
8 Exhibit 180.

9 A Yes, sir.

10 Q This is the low-power grant for Station K56DP, Don
11 Peter, for Houston, Texas, the name of the grant -- of the
12 permittee rather is Translator TV, Inc., do you see that?

13 A Yes, sir.

14 Q Now, the grant date is reflected January 29, 1988,
15 do you recall it being brought to your attention on or about
16 January 29, 1988 that Translator TV, Inc. had received a
17 construction permit for a low-power station in Houston, Texas?

18 A The time came when I became aware of this grant but
19 I couldn't give you a precise date that I became aware of it.

20 Q Would it be the normal course for a grant of a
21 permit to be brought to your attention relatively quickly,
22 that is, within a matter of days after its occurrence?

23 A That would be the pattern, yes, sir.

24 Q And who would bring that information to your
25 attention?

1 A Typically Mrs. Duff.

2 Q Was this also something that Mr. May would bring to
3 your attention?

4 A Possibly but not usually.

5 Q Mr. May would bring to your attention the grant of a
6 full-power station but not a low-power station?

7 A Probably.

8 Q But it would have been in the normal course for Mrs.
9 Duff to have brought this matter to your attention relatively
10 quickly after the grant date.

11 A I believe so.

12 Q Do you have any recollection of that having taken
13 place?

14 A No, sir.

15 Q Do you recall any discussion prior to what appears
16 in your testimony relative to Houston and that testimony
17 relates that this matter was not discussed, by this matter, I
18 mean, whether or not to construct the Houston station,
19 apparently was not discussed until sometime in 1989, so do you
20 recall there being any conversations in early 1988, January,
21 February 1988 as to what to do with the grant of a low-power
22 permit for Houston, Texas?

23 A No, sir.

24 Q Now, at this time, call if you will, that National
25 Minority TV, the successor to Translator TV, Inc., has one

1 permit in hand, that being for the Odessa television station.

2 A Um-hum.

3 Q There are pending applications for Portland for a
4 full-power station and one or more low-power stations that
5 have been filed for in July of 1987. Do you remember we went
6 over a list, Fresno, Waldorf, Douglasville, San Diego?

7 A Yes, yes, sir.

8 Q So this is the second grant --

9 A Yes.

10 Q -- that National Minority is getting.

11 A Yes, sir.

12 Q And you have no recollection of --

13 JUDGE CHACKIN: One second.

14 (Off the record. Back on the record.)

15 BY MR. SHOOK:

16 Q You have no recollection of this matter being
17 brought to your attention in late January or early February
18 1988?

19 A I told you, Mr. Shook, that I -- there came a time
20 when I became aware of this but I just couldn't tell you a
21 precise date.

22 Q Do you have any recollection as to the general time
23 that you became aware of it?

24 A No, sir.

25 Q Please turn to Mass Media Exhibit 181.

1 A Yes, sir.

2 Q Page 1, the paragraph that begins "And now, just a
3 few days ago...", it's basically in the middle of the page, do
4 you see that?

5 A I see it.

6 Q Now, here it says, "we signed the final contract for
7 Channel 24 Portland, Oregon. Portland will be operated by
8 National Minority TV, an affiliated corporation of which I am
9 president". Now, I take it by the "we" you were referring
10 specifically to National Minority TV?

11 A As always, the "we" stands for the broadest possible
12 interpretation of the network, but obviously here, in the
13 narrower sense it does refer to National Minority, yes, sir.

14 Q Now, looking at the last sentence, I don't know who
15 Nancy Harmon is and it really doesn't matter for purposes of
16 my question, but it says to the effect "she can't wait till
17 TBN is on the air", etc. Now, was it understood from the very
18 beginning with respect to both Odessa and Portland that the
19 programming that was going to be on the air for twenty-four
20 hours a day was TBN programming?

21 A It was always understood that these stations would
22 be an affiliate of the Trinity Broadcasting Network but
23 obviously each station is expected and indeed required by the
24 agency to ultimately produce and air some local programming so
25 we knew there would be hours that it would break away from the

1 network and insert local programming or even paid-for national
2 programming.

3 Q But this was known right from the very beginning, I
4 mean, there was no question in anybody's mind that Portland
5 was going to put on TBN programming as soon as it signed on
6 the air, correct?

7 A Absolutely.

8 Q Please turn to Mass Media Exhibit 184.

9 A Yes, sir.

10 Q Now, this is the newsletter for March 1988 and I'd
11 like you to direct your attention to the second page.

12 A Yes, sir.

13 Q The first picture and the caption that accompanies
14 it, there's a listing of -- it appears to be stations and
15 locations, do you see that?

16 A Yes, sir.

17 Q It looks like Channel 40, L.A., Channel 21, Phoenix,
18 etc.

19 A Yes.

20 Q Now, take a look through that, please, is there a
21 common thread to the stations that are noted there?

22 A I certainly see what appears to be all of the
23 Trinity owned and operated stations, I see Beaumont, actually
24 Channel 44 South Texas is Harlingen so I see Harlingen,
25 Beaumont and Houston which are CET stations. I see Nevis, an

1 off-shore foreign station, Guatemala, Italy, Ciskei. These
2 would all be stations that Trinity has an interest in by
3 virtue of common directors.

4 Q But they don't include the stations that are simply
5 -- have program affiliations with Trinity.

6 A No, sir.

7 Q Now, turning to page 3.

8 A Yes, sir.

9 Q The third caption down, there's a reference to what
10 the TBN network includes, do you see that "twelve full-power
11 stations, three full-power educational stations", etc.?

12 A Yes, sir.

13 Q Now, by that, it's the owned and operated stations
14 plus the CET stations?

15 A I'm simply including the stations that are a part of
16 the overall network, our twelve owned and operated stations,
17 the three different class non-commercial stations, the forty-
18 seven low-power stations and then the cable stations and so
19 on, yes, sir.

20 Q Now, the designation here though does not include
21 those full-power stations which are simply affiliated with
22 TBN?

23 A No, sir.

24 JUDGE CHACHKIN: Are we moving for another reason?

25 MR. SHOOK: We have one more question with this

1 exhibit.

2 JUDGE CHACHKIN: Oh, go ahead, finish your question,
3 go ahead, finish your questions with this.

4 MR. SHOOK: Thank you, sir.

5 BY MR. SHOOK:

6 Q Moving on to page 4.

7 A Yes, sir.

8 Q The first caption, I take it from the write-up of
9 the caption that you had an understanding that there was a
10 very limited time in which to build a low-power station once a
11 permit was received.

12 A Yes, sir.

13 Q Now, it's noted here, a six-month to one-year
14 window, is that what you understood?

15 A Yes, sir, because in some cases we only got the
16 permit after it had already aged somewhat so in some cases we
17 got them with six months, in some cases even less time to
18 build them so I'm just giving the reader here an overall
19 estimation of the amount of time that we might have to build
20 these stations.

21 Q Now, you're thinking of those situations not so much
22 where you've acquired the permit directly from the Commission
23 but one from which you bought the permit from somebody else.

24 A Yes, sir.

25 Q I see.

1 JUDGE CHACHKIN: Are you finished with this now?

2 MR. SHOOK: I am, Your Honor.

3 JUDGE CHACHKIN: We're in recess till tomorrow at

4 9:00 a.m.

5 (Whereupon, the conference was adjourned at 4:00

6 p.m. on December 16, 1993.)

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